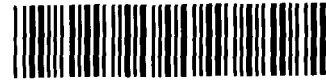


September 16, 1982

Sauget Report

US EPA RECORDS CENTER REGION 5



412210

THROUGH: John Connell, Chief, Illinois/Indiana Field Investigation Section  
Gerald Regan, Chief, Central District Office

Edward DiDomenico, Chief  
Engineering Unit, Water Quality Branch

Attached is the report on the Sauget survey, consisting of CSI-T's at the following seven facilities:

Sauget POTW  
Ethyl Corporation  
Clayton Chemical  
Trade Waste Incinerator  
Roger Cartage  
Midwest Rubber  
Cerro Copper

The report also contains the results of the groundwater and soil sampling.

The following information is missing from the report because the analytical results are not available at this time:

Organic Analysis:

Sauget POTW - sludge  
Clayton Chemical - well sump sediment  
Cerro Copper - lagoon sediment

Dioxins:

Sauget POTW - effluent and sludge

This information will be sent to you when it is available. It is not believed that this information will significantly affect the results of the survey.

The Environmental Services Division expended 1.40 work years on this project.

cc: A. H. Manzardo

JConnell/pja  
CDO

9/16/82  
CDO

9/17/82

CDO  
GR  
9/17/82

9/17/82

Sauget Report

William H. Sanders III, Director  
Environmental Services Division

Charles H. Sutfin, Director  
Water Division

Attached is the report of the Compliance Sampling Inspections - toxic performed by the Central District Office in the Sauget area. This survey was requested by the Permit Section to determine the quantity of toxic pollutants being discharged to the Sauget POTW from selective industries and being discharged by the POTW into the Mississippi River.

The results of the survey indicate that the indirect dischargers which were sampled contribute approximately 15% of the total flow to the treatment plant but only about 3% of the total organic priority pollutant load. The remaining 97% of the organic priority pollutant load is contributed by sources not sampled during the survey. Both the influent and effluent of the treatment showed strong mutagenic responses. However, these responses were caused by sources other than those sampled during the survey.

Because of the importance and the complexity of this survey, the Division spent more resources than for a comparable number of CSI-T's conducted individually. The Environmental Services Division expended 1.40 work years for this survey.

---

William H. Sanders III, Director

JConnell/pja  
CDO

9/16/82

CDO

ESD

R  
9/17/82

dy 9/17/82

② JWS  
9-17

Sauget Report

William H. Sanders III, Director  
Environmental Services Division

Charles H. Sutfin, Director  
Water Division

Attached is the report of the Compliance Sampling Inspections - Toxic performed by the Central District Office during November 1982 at the City of Sauget Wastewater Treatment Plant and the Monsanto Krummrich Plant. This survey was requested by the Water Compliance Branch to determine the quantity of toxic pollutants being discharged to the POTW by Monsanto and being discharged by the POTW.

The results of the survey indicate that Monsanto is the probable source of the chlorinated and nitrated organic compounds entering the POTW. Also, concentrations of mercury and nickel in the Treatment plant effluent samples were above the Illinois Effluent Standards.

No total TCDDs or TCDFs were detected in the Monsanto discharge, the treatment plant influent or effluent in the detection range from 0.4 to 1.0 part per trillion. However, higher CDDs and CDFs were detected with concentrations up to of 230 ppt at both the Monsanto discharge and the Treatment plant discharge

William H. Sanders III, Director

Attachment

cc: K. Fenner - 540  
E. Di Domenico - 5400  
A. Manzano - 5400

SS CDD J.CONNELL:hjc 6/22/83

fl 6/24/83

CDO  
CR  
6/24/83

WCB  
6-27-83  
6/27

Plant Name: Sauget Wastewater Treatment Plant  
Monsanto Chemical Company

Plant Location: Sauget, Illinois

NPDES PERMIT: IL0021407

Sampling Dates: November 9, 16-17, 22-23, 1982

U.S. EPA Inspectors:

John Connell (All three weeks)  
John McGuire (2nd & 3rd weeks)  
Ron Lillich (1st week)  
Charles Steiner (1st week)  
Steve Wynnchenko (2nd week)  
Charles Miller (3rd week)  
Richard Boice (3rd week)

Plant Representatives:

Carl Marciante, Plant Manager

## INTRODUCTION

At the request of the Water Compliance Branch, the Central District Office performed a series of Compliance Sampling Inspection-toxics at the Sauget, Illinois Wastewater Treatment Plant for three weeks during November 1982. The influent and effluent of the treatment plant were sampled as well as the sampling manhole on Route 3 which represents most of the discharge from the Monsanto Krummrich Plant.

From the flow information collected during the survey, the flow at the Rt. 3 sampling manhole comprised 60 - 66% of the total influent to the treatment plant. Also, approximately 90% of the flow at the Rt. 3 sampling manhole was discharged from the Monsanto Plant.

## SAMPLING LOCATION:

The effluent samples for all three weeks were collected at the plant effluent just as the wastewater entered the sewer discharging to the river. The influent sample for the first week was taken upstream of the oil skimmer prior to the trash racks. For the second and third weeks, the influent samples were collected after the oil skimmers and prior to the grit chambers-neutralizer bays, see Figure 1. The sampling location had to be changed because of the use of automatic samplers. Since the surface of the wastewater in the influent pit is approximately 25 feet below ground level, the ISCO samplers could not draw samples if the samplers were placed at ground level. In addition, the samplers could not have been placed on the catwalk at a lower level in the influent pit since the samplers are not explosion proof. However, the sampling location chosen is representative of the wastewater entering the treatment plant.

The Monsanto Rt. 3 sampling manhole is shown in Figure 2. This is the sampling point used by the treatment plant to monitor Monsanto's discharge. Mr. Marciante stated that most of Monsanto's discharge is through the Rt. 3 sewer. As seen in Figure 3, there is no discharge from the Monsanto plant into the sewer just north of the plant. However, from a sewer map of the Monsanto plant there appears to be some surface runoff into the north sewer. Also, there may be some process discharge from the northwest part of the plant into the north sewer. According to the sewer map of the Monsanto plant, most of the wastewater flows south and is discharged into the Rt. 3 sewer which was sampled.

Monsanto is not the sole discharger into the Rt. 3 sewer. As seen in Figure 2, the wastewater from the following dischargers enters the sewer prior to the Monsanto discharge point: The east side of Cerro Copper, Sterling Steel (which was not operating at the time of the sampling) and the Village of Sauget (residential area). Mr. Marciante stated that the discharge from Roger Cartage is included with the discharge from the Village of Sauget.

## SAMPLING METHOD:

Two different sampling methods were used during the survey. One method was a composite of a series of grab samples, the other method was a 24 hour composite sample using ISCO samplers (Model 1680).

A composite of grab samplers were taken at the Monsanto Rt. 3 sampling manhole during each of the three weeks. ISCO samples could not be used at this location because the surface of the wastewater is approximately 20 ft. below ground level and the wastewater flow was in excess of 3000 gpm. Also, grab samples were composited at the influent and effluent of the treatment plant during the first week. This sampling method consisted of collecting a sample in a 10,000 ml glass jar which was rinsed with wastewater just prior to each sample collection. An aliquot of the sample was then poured into two 10,000 ml glass jars (storage jars) with telfon lined caps. The storage jar was cleaned with methylene chloride prior to use. At the end of the compositing period, each storage jar was shaken and the sample water poured into the various sample bottles. Duplicate samples were collected in the same manner for the treatment plant. ISCO samplers with 10,000 ml glass jars were used to collect 24 hour time composite samples, with the sampler drawing approximately 200 ml of water every 30 minutes. These were taken at the plant influent and effluent during the second and third week of the survey. The 10,000 ml glass jars were cleaned with methylene chloride prior to use. Four ISCO samplers were used at the plant effluent during both the second and third week. Four samplers were also used on the influent during the third week, two samplers for USEPA and two samplers for the plant. Only three samplers were used for the plant influent during the second week. As a result, after all the sample bottles were filled for these EPA samples, there was only sufficient sample water remaining for the plant to fill two amber gallon bottles.

A single oil and grease sample was collected at each sampling location each week. The oil and grease samples were collected in a quart glass bottle. Duplicate samples were collected for the plant.

All sample preservation, sample handling and bottle cleaning procedures were in accordance with the Central District Office Field Procedure manual. Chain-of-custody was maintained on the samples and transferred to the Central Regional Laboratory. The treatment plant supplied their own sample bottles, except for the oil and grease bottles. CDO personnel preserved the plant's samples.

#### FLOW MEASUREMENT

The wastewater influent flow to the treatment plant was obtained from a recorder chart in the control room for the first week's sampling and from the totalizer for the second and third week of sampling. For the last two weeks of the survey, the flow was obtained for both the period of the 24 hour composite sampling and the period of the sampling at the Rt. 3 manhole.

The flow at the Rt. 3 sampling manhole covering the sampling period was obtained from a totalizer at the manhole. Also, an instantaneous flow measurement was obtained from flow instrumentation at the manhole each time a grab sample was collected. In addition, the flow from the Village of Sauget (including Sterling Steel and Roger Cartage) and Cerro Copper "east" were obtained. The discharge from the Monsanto plant can be determined by difference between the flow at the Rt. 3 sampling manhole and the flow from the Village of Sauget and Cerro Copper "east". The flow meter measuring the flow from the

Village of Sauget was not operating; however, the plant estimated a flow of 100,000 GPD. The totalizer flow readings for the Cerro Copper "east" discharge is taken by treatment plant personnel only once a day, at approximately 9:00 a.m. These 24 hour readings are only estimates of the flow during the time of sampling at the Rt. 3 manhole.

#### PLANT OPERATIONS

During the first week of sampling, the grit chamber was plugged and not operating; also, the south clarifier was out of service at the start of the day but was started being filled at 1:00 p.m. During the sampling for the second and third week, all of the plant processes were operating.

#### SAMPLING LOG

##### First Week (November 9, 1982)

##### Effluent Sample (83CC01S02)

Time	Aliquot (ml)
11:35 a.m.	3000
1:30 p.m.	3000
3:35 p.m.	3000

The oil and grease sample was collected at 3:50 p.m.

##### Influent Sample (83CC01S01)

Time	Aliquot (ml)
12:10 p.m.	3000
1:50 p.m.	3000
4:00 p.m.	3000

The oil and grease sample was collected at 4:15 p.m.

##### RT. 3 Sample (83CC01S03)

Time	Aliquot (ml)	Organic	Other	Flow (gal/min) Instantaneous
		Dioxins	Parameters	
2:25 p.m.	4000		2850	3279
4:25 p.m.	4000		2850	3422

The oil and grease sample was collected at 4:50 p.m. The aliquot collected at 2:45 p.m. was light tan in color, that collected at 4:25 p.m. was gray in color and the aliquot collected for the plant at 4:25 p.m. was a brown color.

Reagent Blank (83CC01R01)

Flow (gal/min) from 2:10 p.m. - 4:25 p.m:

Treatment plant	5700
Rt. 3	3525
Village of Sauget *	69
Cerro Copper "east" *	249
Monsanto	3207

\* based on 24 hour flow

Second Week (November 16-17, 1982)

Effluent Samples (83CC02S02)

Four ISCO samples ran from 11:50 a.m. on November 16 to 10:50 a.m. on November 17, 1982. The oil and grease sample was collected at 10:50 a.m. on November 17, 1982. The pH of the composite sample was 6.9.

Influent Samples (83CC02S01)

Three ISCO samples ran from 11:25 a.m. on November 16 to 10:25 a.m. on November 17, 1982. The oil and grease sample was collected at 9:25 a.m. on November 17, 1982. The pH of the composite sample was 3.3.

The plant flow during the 24 hour sampling period was 7.81 MG.

Rt. 3 Samples (November 16, 1982) (83CC02S03)

Time	Aliquot (ml)	Flow (gal/min) Instantaneous
12:45 p.m.	2000	3564
1:40 p.m.	2000	3849
2:40 p.m.	2000	3707
3:40 p.m.	2000	3493
4:40 p.m.	1500	3350



Only 1500 ml were added to the storage jug for the fifth sample because this filled the jug. The oil and grease sample was collected at 2:50 p.m.

Reagent Blank (83CC02R04)

Flow (gal/min) during sampling at Rt. 3:

Plant Effluent 12:04 p.m. - 4:00 p.m.	5424
Rt. 3 12:55 p.m. - 4:47 p.m.	3565
Village of Sauget *	69
Cerro Copper "east" *	344
Monsanto	3152

\* based on 24 hour flow

Third Week (November 22 - 23, 1983)

Effluent Samples (83CC03S01)

Four ISCO samples ran from 9:10 a.m. on November 22, 1982 to 8:10 a.m. on November 23, 1982. The oil and grease sample was collected at 8:35 a.m. on November 23, 1982.

Influent Samples (83CC03S02)

Four ISCO samples ran from 10:50 a.m. on November 23, 1982 to 9:50 a.m. on November 23, 1982. The oil and grease sample was collected at 9:13 a.m. on November 23, 1982.

The plant influent flow during the 24 hour sampling period was 8.94 MG. For the sampling on November 22-23, 1982 the sample bottles were labeled incorrectly. The correct influent sample number is 83CC03S02 and the correct effluent number is 83CC03S01. This error was not discovered until the samples were analyzed. Two methods were used to verify the error. First, in reviewing the data it was noticed that S02 had higher metal concentration than S01. Second, the sample bottles were inspected. The S02 sample bottles appeared similar to the influent sample bottles for the first two weeks, and the S01 sample bottles appeared similar to the effluent sample bottles for the first two weeks.

Rt. 3 Sample (November 22, 1982) (83CC03S03)

Time	Aliquot (ml)	Flow (gal/min) Instantaneous
11:20 a.m.	1500	4135
12:20 p.m.	1500	3707
1:20 p.m.	1500	3921
2:20 p.m.	1500	3636
3:20 p.m.	1500	3849
4:20 p.m.	1500	3707

The oil and grease sample was collected at 3:53 p.m.

Reagent Blank (83CC03R04)

Flow (gal/min) during sampling at Rt. 3:

Plant Effluent 9:16 a.m.-4:44 p.m.	5699
Rt. 3 11:33 a.m. - 4:28 p.m.	3692
Village of Sauget *	69
Cerro Copper "east" *	440
Monsanto	3183

\* based 24 hour flow

COMPOSITE SAMPLES

The following composite samples were prepared by the Region V Central Regional Laboratory for the dioxin/furan analyses:

<u>Dioxin/Furan Analysis Samples</u>	<u>1260 ml alequots combined from sample #</u>	<u>Source</u>	<u>Date</u>
<u>83CC04S01</u>	83CC01S01	influent	11/9/82
	83CC02S01	influent	11/16-17/82
	83CC03S01	effluent	11/22-23/82
<u>83CC04S02</u>	83CC01S02	effluent	11/9/82
	83CC02S02	effluent	11/16-17/82
	83CC03S02	influent	11/22-23/82
<u>83CC04S03</u>	83CC01S03	Route 3	11/9/83
	83CC02S03	Route 3	11/16-17/82
	83CC03S03	Route 3	11/22-23/83

As can be seen, sample 83CC04S03 was a composite of the samples collected from the Route 3 manhole. 83CC04S01 and 83CC04S02 were supposed to be composites of influent and effluent samples, respectively. However, the influent and effluent sample numbers were mixed up for the samples collected on 11/22-23/82.

#### NPDES

The Sauget WWTP was rated marginal for flow measurement and unsatisfactory for laboratory practices. The flow measurement equipment needed adjustment for zero flow and the plant had scheduled this repair for late November, 1982. The laboratory does not follow Standard Methods for preparation and analysis of BOD. The plant freezes the Friday through Wednesday samples and then prepares and starts the 5 day test for all seven samples on Thursday.

#### ANALYTICAL RESULTS

Analytical results are tabulated in Attachments 1, 2, 3 and 4. In addition, the laboratory data sheets are attached.

All analyses were completed by the USEPA Region V Central Regional Laboratory (CRL) except for the dioxin/furan which was performed by Wright State University. The CRL noted that some of the samples were so toxic that the BOD values could not be measured. Also note that the concentrations of the tentatively identified organic compounds are very rough approximations.

Attachment 3 shows that the concentrations of mercury in the effluent samples for all three weeks are above the Illinois Effluent Standard. In addition, the concentration of nickle in sample 82CC01S02 (the first week) is above the Illinois Effluent Standard.

In Attachment 5, the percent removal of metals by the Sauget POTW is tabulated. Most of the percent removals are comparable to those calculated from the results for samples collected on March 2-3, 1982.

In Attachments 6, 7 and 8, pollutant loadings and percent loadings are tabulated. The results show that the flow from the Route 3 manhole can contribute a large portion of the Sauget POTW pollutant load for the following significant parameters:

- suspended solids

- phenolics

- 2 - chlorophenol

- 2, 4 - dichlorophenol

- 2 - nitrophenol

- 4 - nitrophenol

- hexachloroethane

1, 2 - dichlorobenzene

1, 3 - dichlorobenzene

1, 4 - dichlorobenzene

nickle

Monsanto is the probable source of the chlorinated and nitrated organics. The loadings and percentages calculated provide only a qualitative comparison because the sampling time periods do not coincide. For example, the Route 3 manhole samples collected on November 16 and November 22, 1982, were five and six hours composite samples, respectively, while the samples from the influent and effluent of the Sauget POTW were twenty-four hour composites.

Not unexpectedly, the pollutant loadings calculated from the sampling during November 1982 is considerably different from the loadings calculated from the March 2-3, 1982 sampling. Parameters that had a very high load on March 2-3, 1982, but much lower loads during the November 1982 sampling are 4-nitrophenol and bis (2 chloroethyl) ether.

The dioxin/furan results are summarized and presented in Attachment 9. As noted in the cover letter from Dr. Fierman, no total TCDDs or TCDFs were detected in the analyses although higher CDDs and CDFs were detected. The following table presents calculated kilogram loadings per day using the average flows. This table appears to show that most of the CDD and CDF loading to the Sauget POTW comes from the flow through the Route 3 manhole.

TABLE OF KILOGRAM LOADINGS IN KG/DAY

<u>Sample</u>	<u>Location</u>	<u>PCDF</u>	<u>HxCDF</u>	<u>HpCDD</u>	<u>OCDD</u>	<u>OCDF</u>
83CC04S01	POTW Influent	.0006	.0002	.0011	.0071	.0003
83CC04S02	POTW Effluent	ND	ND	.00003	.0015	ND
83CC04S03	Rt. 3 MNHOLE	.0003	.0001	.0009	.0045	.0002

The mix-up in labeling the sample bottles for the third week is probably the reason dioxins were detected in the effluent sample.

APR 30 1982.

Krummrich Industrial Waste (Monsanto) Landfill Site, Sauget, Illinois

Hilt Clark  
Environmental and Human Health Specialist

Sandra S. Gardebring  
Acting Enforcement Counsel

THRU: Karl E. Bremer, Chief  
Toxic Substances Section  
Toxic Materials Branch

Introduction/Abstract

A comparative analysis is provided on chemicals (1) detected in seepages from the Krummrich Industrial Waste (Monsanto) Landfill site on the Mississippi River, (2) detected in monitoring wells at the same site, (3) reported by Monsanto to be disposed of in the same site, and (4) reported to be manufactured by the Krummrich Plant in the 1977 chemical inventory of the Toxic Substances Control Act (TSCA) and under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). The analysis reveals that there is substantial association between chemicals detected in seeps from the site by Illinois Environmental Protection Agency (IEPA) and Monsanto and those chemicals reported to have been disposed of at the Krummrich Landfill, manufactured by Monsanto, and found in monitoring wells. Taken in total, the strength of these associations leaves little doubt that the source of the seeps and the contamination of the Mississippi River bank is the Krummrich Industrial Waste Landfill site.

Analysis

As shown in the table "Chemical Data: Krummrich Plant and Disposal Site, Sauget, Illinois" (Attachment 1), of 26 specific compounds or classes of compounds detected by IEPA in seeps (Attachments 2, 3 and 4) emanating from the Krummrich Landfill, Monsanto reported disposing of 14 (54%) of these compounds or classes in the Krummrich Landfill in 1968 (Attachment 5). The association between chemicals found in seeps and those disposed of by Monsanto would be expected to be even more substantial if detailed knowledge were available on (1) specific compounds disposed (i.e., aromatic carboxylic acids), (2) wastes from production processes (i.e., sludge from alkyl benzene filtration), (3) wastes from research (i.e., miscellaneous solvents and materials), and (4) wastes placed in the Krummrich Landfill from the Monsanto plant located in St. Louis, Missouri. Eight compounds were detected in concentrations exceeding 10 ppm in one more of the seeps at the Krummrich Landfill. Five of these eight compounds were reported by Monsanto to have been the dominate chemicals landfilled at the Krummrich site (700 - 3,000 yard<sup>2</sup>). It would be expected that these particular chemicals would be present at much higher concentrations in the seeps, relative to the other chemicals detected. Two other compounds--2,4-D and

2,4,5-T--and their derivatives found above 10 ppm are known to have been produced at the Krummrich plant in Sauget. These chemical wastes may have been landfilled at the Krummrich site after 1968 or were unreported at that time. Chlorinated dioxins and dibenzofurans, which were also detected in seeps from the Krummrich Landfill by Monsanto and EPA, are widely recognized as contaminants of chlorophenolic chemical wastes such as those manufactured and landfilled by Monsanto in Sauget.

With the exception of nitroaniline, chemicals (86%) disposed of at the Krummrich site in excess of 700 cubic yards were present in one or more of the samples analyzed by Monsanto and IEPA. This high degree of association provides particularly strong and convincing evidence that the source of the seeps is the Krummrich Landfill. Further support for this conclusion is provided from Monsanto's chemical production records, from TSCA and from FIFRA. Fifteen (58%) of the 26 chemicals detected in the seeps by IEPA and EPA are produced or are known by-products (i.e., chlorinated dioxins and dibenzofurans) of the Krummrich plant. Using Monsanto's data on seeps, nine (75%) of the 12 chemicals found in seeps have been produced at the Krummrich plant. In addition, all four chemicals discovered by IEPA in monitoring wells at the Krummrich Landfill were also present in seeps emanating from the site (Attachment 6).

#### Conclusion

Taken together, these associations provide strong evidence that the Krummrich Landfill is the source of the seeps found on the Mississippi River bank immediately below the landfill site.

#### Attachments

cc: Bartelt  
Fenner  
O'Toole  
Holoska  
Daggett

5HT-TUB:MCLARK:bb:3-2291:4/29/82

BREMER

## CHEMICAL DATA: KRUMMRICH PLANT AND DISPOSAL SITE, SAUGET, ILLINOIS

SEEP ANALYSIS			MONITORING WELLS	DISPOSAL	MANUFACTUR
IEPA	Monsanto	EPA	IEPA	MONSANTO	MONSANTO
PCB	X				X
Toluene					
Chlorobenzene	X			X (1,100 yd <sup>3</sup> )	X
Dichlorobenzene	X		X		X
Chloroaniline*	X			X (1,100 yd <sup>3</sup> )	X
Chloronitrobenzene*	X			X (1,700 yd <sup>3</sup> )	X
Dichloronitrobenzene					X
Chlorophenol*	X		X	X (>720 yd <sup>3</sup> )	X
Dichlorophenol*	X			X (3,000 yd <sup>3</sup> )	X
2,4-D/2,4-D-Isomers*	X				X
2,5,-T/Similar Chemical*					X
Aniline	X				
Dichloroaniline	X			X (aniline derivatives)	
Chloronitroaniline				X (aniline derivatives)	X
Nitroaniline				X (1,700 yd <sup>3</sup> )	X
Phenol*	X			X (1,000 yd <sup>3</sup> )	
Nitrophenol					
Methylphenol					
Diphenyldiol	X		X		
Diphenyl-2-ol					
Benzoic compounds*				X	X
4-methyl-2-pentenol				X (aliphatic alcohols)	
2-methylcyclopentanol				X (aliphatic alcohols)	
Benzene sulfonamide				X (sulfonated aromatics)	
Chlorotoluene			X		X
Dioxins/dibenzofurans	X	X		X (byproduct)	X (byproduct)

\*Concentrations &gt;10 ppm in seeps (IEPA data)

Time Collected:

Lab #

0022689

Date Collected:

10/2/81

SPECIAL ANALYSIS FORM

Date Received

OCT 5 1981

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
DIVISION OF LAND/NOISE POLLUTION CONTROL

COUNTY:

St. Clair

FILE HEADING:

Sewer / Dump (Toxic)

FILE NUMBER:

General

SOURCE OF SAMPLE: (Exact Location)

C- water sample collected from  
leachate seep down gradient from where B was collected, also  
along river bank ~ 20 ft from river's edge.

PHYSICAL OBSERVATIONS, REMARKS:

sampled liquid was relatively colorless;  
strong organic odor.

TESTS REQUESTED:

quantitative analyses for chlorophenols, chlorobenzenes,  
chlorotoluenes, 2,4,5-T; identify any other constituents; WADSWORTH  
sample may contain D/DX/K (RUSH)

COLLECTED BY:

E.P. Plummer

LLPC

TRANSPORTED BY:

## LABORATORY

RECEIVED BY:

B.A.

DATE

COMPLETED:

11/23/81

DATE

FORWARDED:

11/23/81

PCBs = 2.6 ug/l (ppb)

Toluene = 150. ug/l

2,4D = 7,800 ug/l

Chlorobenzene = 1600 ug/l

2,4-D isomer or very similar  
compound = 29,000 ug/l

4-Methyl-2-pentanone = 180 ug/l

Chlorophenol = 27,000 ug/l

Dichlorobenzene = 250 ug/l

phenol = 12,000 ug/l

Chloroaniline = 38,000 ug/l

Methylphenol = 110 ug/l

Dichlorophenol = 2100 ug/l

Methylbenzenesulfonamide =

Chloronitrobenzene = 820 ug/l

Chloromethylphenol = 30 ug/l

Dichloronitrobenzene = 730 ug/l

Aniline = 35 ug/l

Dichloroaniline = 2800 ug/l

2,4,5-T isomer or very similar  
Compound = 6,500 ug/l

Biphenyl-2-ol = 280 ug/l

2,4,5-T &lt; 200 ug/l

Benzoic acid/decimol = 20 ug/l

Benzenedicarboxylic acid/decimol = 200 ug/l

(NOT FOR DATA PROCESSING)

0022689



Sample Collected: \_\_\_\_\_

Lab # **DC22688**Date Collected: 10/2/81

SPECIAL ANALYSIS FORM

Date Received

COT 51931

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
DIVISION OF LAND/NOISE POLLUTION CONTROL

COUNTY:

FILE READING:

FILE NUMBER:

St. ClairSewage/Dump (Toxic)General

SOURCE OF SAMPLE: (Exact Location)

B - water sample collected from  
leachate seep down gradient from where A was collected;  
also along the River Bank  $\approx$  50 ft from river's edge

PHYSICAL OBSERVATIONS, REMARKS:

sampled liquid was relatively colorless  
strong organic odor

TESTS REQUESTED:

quantitative analyses for chlorophenols, chlorobenzenes,  
chlorotoluene, 2,4,5-T; identify any other constituents; WAPWIT.  
Sample may contain DIOXINS (RUSH)

COLLECTED BY:

TRANSPORTED BY:

## LABORATORY

RECEIVED BY:

DATE

COMPLETED:

DATE

FORWARDED:

PCBa < 0.5  $\mu$ g/l (ppb)phenol = 17,800.  $\mu$ g/lmethyl phenol = 220.  $\mu$ g/lmethyl benzene sulfonamide = 2000.  $\mu$ g/lToluene = 40  $\mu$ g/lchlorobenzene = 390  $\mu$ g/lAniline = 120.  $\mu$ g/lDichloronitrobenzene = 590.  $\mu$ g/lchlorophenol = 30,000  $\mu$ g/lBenzene sulfonamide = 650.  $\mu$ g/lchloroaniline = 22,000  $\mu$ g/lchloronitroaniline = 33.  $\mu$ g/lDichlorophenol = 7200  $\mu$ g/lNitroaniline = 23.  $\mu$ g/lchloronitrobenzene = 9600  $\mu$ g/ldichlorobenzene = 110.  $\mu$ g/lDichloroaniline = 820  $\mu$ g/lBenzoic acid/derivative =Biphenyl-2-ol = 300  $\mu$ g/l6600.  $\mu$ g/l2,4-D = 17,000  $\mu$ g/l2,4-D isomer or very similar compound = 40,000  $\mu$ g/l2,4,5-T < 200.  $\mu$ g/l

(NOT FOR DATA PROCESSING)

2,4,5-T isomer or very similar compound = 12,000  $\mu$ g/l

DC22688

0022687

me. Collected:                     

Lab #

SPECIAL ANALYSIS FORM

601

Date Collected: 10/2/81

Date Received

OCT 5 1981

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
DIVISION OF LAND/NOISE POLLUTION CONTROL

COUNTY:

St. Clair

FILE HEADING:

Sauget/Dump (Toxic)

FILE NUMBER:

General

SOURCE OF SAMPLE: (Exact Location)

A- water sample collected from  
leachate seep along <sup>East</sup> Mississippi River bank ~ 30 ft. from  
river edge.

PHYSICAL OBSERVATIONS, REMARKS:

sample relatively colorless although  
some sediment is mixed with the sample; strong organic odor

TESTS REQUESTED:

quantitative analyses for chlorophenols, chlorobenzenes,  
chlorotoluene, 2,4,5-T; identify any other constituents; WAPN  
sample may ~~also~~ contain Dioxins (PLUSH)

COLLECTED BY:

C. D. Danner

TRANSPORTED BY:

ALPK

## LABORATORY

RECEIVED BY:

B.A.

DATE  
COMPLETED:

11/23/81

DATE  
FORWARDED:

11/23/81

PCBa &lt; 0.5 µg/l (ppb)

Toluene = 11 µg/l

Chlorobenzene = 160 µg/l

Chloroaniline = 24,000 µg/l

Chloronitrobenzene = 21,000 µg/l

2,4D = 16,000 µg/l

2,4-D isomer or very similar compound = 38,000 µg/l

2,4,5T = &lt; 200 µg/l

2,4,5-T or very similar compound = 10,000 µg/l

Dichloronitrobenzene = 740 µg/l

Dichloroaniline = 870 µg/l

Chloronitroaniline = 84 µg/l

Nitroaniline = 100 µg/l

The following acids or their derivatives were also  
detected. (NOT FOR DATA PROCESSING)

Benzoic acid/derivative = 12,000 µg/l

and Benzene-dicarboxylic acid/derivative = 2,500 µg/l

Chlorophenol = 15,000 µg/l

phenol = 22,000 µg/l

Methylphenol = 570 µg/l

Dichlorophenol = 32,000 µg/l

Nitrophenol = 600 µg/l

Biphenyl diol = 1700 µg/l

Aniline = 550 µg/l

Methylbenzene sulfonamide = 10 µg/l

4-Methyl-2-pentanol = 26 µg/l

2-Methylcyclopentanol = 93 µg/l

Biphenyl-2-ol = 300 µg/l

Benzene sulfonamide = 70 µg/l

0022687

# Monsanto

COMPANY

Seuget, Illinois 62201  
(618) 271-5635

August 16, 1968

Mr. C. W. Klassen  
Technical Secretary  
State of Illinois Sanitary Water Board  
Springfield, Illinois 62706

Dear Mr. Klassen:

In reply to your letter of August 7, 1968, I have the following information which you need to set up a monitoring program for our industrial waste disposal site.

In general we deposit at this site those wastes which would add to the sludge load at the waste treatment plant or would dissolve in our wastewater and add to the phenol content, C.O.D. or color of the final effluent. Chemically, they fall into 6 main groups:

1. Phenols
2. Aromatic Nitro Compounds
3. Aromatic Amines and Nitro Amines (highly colored)
4. Chlorinated aromatic hydrocarbons
5. Aromatic and aliphatic Carboxylic acids
6. Condensation or reaction products of the above

A more detailed list of sources and quantities follows:

1. Still Residues - tars, condensation and decomposition products of doubtful composition but with some of the primary product remaining.

From the Distillation of:

Approx. Annual Amount

a. Phenol	1,020 Cu. yds.
b. Chlorophenol	720 Cu. yds.
c. Nitro-Aniline and similar compounds	1,700 Cu. yds.
d. Chlorobenzol (Tri-Tetrachlor)	130 Cu. yds.
e. Chloro aniline	1,100 Cu. yds.
f. Other aniline derivatives	200 Cu. yds.
g. Nitro benzene derivatives	100 Cu. yds.
h. Aromatic carboxylic acids (Maleic, Phthalic, etc.)	1,500 Cu. yds.
i. Chlorophenol Ether	350 Cu. yds.

August 16, 1968

## 2. By-Products -

a. Mixed isomers of nitrochlorobenzene	1,700 Cu. yds.
"          "          " Dichlorophenol	3,000 Cu. yds.
b. Waste Maleic Anhydride	730 Cu. yds.
c. Waste Chlorobenzenes and Nitro-chlorobenzenes	120 Cu. yds.

## 3. Contaminated Water and Acids -

a. Water with varying amounts of phenols (0-15%)	7,200 Cu. yds.
b. Waste Sulfuric acid with chlorophenol present	1,500 Cu. yds.
c. Caustic Soda Solution with chlorophenol present	5,300 Cu. yds.

## 4. Waste Solvents -

a. Waste Methanol contaminated with Mercaptans	600 Cu. yds.
b. Waste Isopropanol - Water and chlorinated hydrocarbon	5,500 Cu. yds.
c. Research Waste: Miscellaneous Solvents and Materials	1,019 Cu. yds.
d. Oily Materials from Oil Additive Production	101 Cu. yds.

## 5. Filter Sludge -

a. Attapulgis Earth -Keisulguhr from Alkyl Benzene filtration	600 Cu. yds.
b. Lime Mud from nitro-aniline production..	1,000 Cu. yds.

## 6. Unwanted Samples and Waste resulting from taking samples -

a. Chlorophenols	72 Cu. yds.
b. Laboratory Samples (Everything)	208 Cu. yds.

August 16, 1968

7. Miscellaneous Wastes -

These consist of spoiled material, floor sweepings, sludge from cleaning equipment and storage tanks etc which would cause problems if sewered. They are mostly reaction products of the above materials eg Esters of phenols or aliphatic alcohols with carboxylic acids such as phthallic, Maleic, or Benzoic acid, Anilides, Sulphonated phenols or other aromatics.

The relative quantities of these materials will necessarily vary according to sales of particular products and there will be additions to and deletions from this list. However, the general chemical classification will remain much the same.

Please let me know if you need any additional information.

Very truly yours,

J. R. McClain  
Plant Manager